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Attorneys for BNSF Railway Company

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

THERESA KENT,

Plaintiff,

v.

BNSF RAILWAY COMPANY,

Defendant.

Civil Case No. 3:12-cv-1469-AC

**STIPULATED MOTION TO EXTEND
DISCOVERY AND CASE SCHEDULE
DEADLINES**

1. Pursuant to LR 7-1, all the parties have conferred and stipulate to this motion.

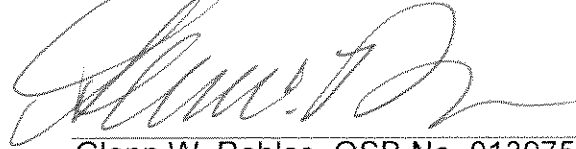
2. The parties jointly request that the Court enlarge the time in which to conduct and complete discovery and other case deadlines by 180 days. The current deadlines are: Expert disclosures completed by 5/20/13; Filing of a joint ADR report by 6/10/13; Rebuttal expert disclosures completed by 6/20/13; Discovery completed by 7/15/13; Dispositive motions filed by 7/26/13; Discovery motions to be filed by 7/29/13; and, DEFERRING the filing of a joint pretrial order.

3. While the parties have engaged in written discovery and depositions, additional and substantive discovery still needs to be completed. Further, the parties wish to conduct settlement negotiations following completion of discovery. Continuing the current discovery and pretrial case deadlines would potentially avoid the costs and expenses associated with proceeding to trial.

WHEREFORE, the parties respectfully request a 180-day extension of all discovery and case deadlines.

DATED: May 3, 2013

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing
STIPULATED MOTION TO EXTEND DISCOVERY AND CASE SCHEDULE
DEADLINES on the date indicated below by:

- ☐ mail with postage prepaid, deposited in the US mail at Portland, Oregon,
- ☐ hand delivery,
- ☐ facsimile transmission,
- ☐ overnight delivery,
- ☒ electronic filing notification.

If served by facsimile transmission, attached to this certificate is the printed confirmation of receipt of the document(s) generated by the transmitting machine. I further certify that said copy was placed in a sealed envelope delivered as indicated above and addressed to said attorney(s) at the address(es) listed below:

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DATED: May 3, 2013


Glenn W. Robles